

**BAKER & HOSTETLER LLP**

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*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
the Estate of Bernard L. Madoff*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

HHI INVESTMENT TRUST #2;

KING HARRIS, in his capacity as trustee of the  
HHI Investment Trust #2, Pam F. Szokol Trust  
dated 02/18/93, William J. Friend Trust dated  
06/22/95, Scott C. Friend Trust of 1984 under  
Trust Agreement dated 11/21/84, Bette D. Harris  
Grandchildren's Trust for the Children of  
Katherine Harris – Pam Friend Szokol under Trust

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-05404 (SMB)

Agreement dated 01/13/59, Bette D. Harris  
Grandchildren's Trust for the Children of  
Katherine Harris – William Friend under Trust  
Agreement dated 01/13/59, Bette D. Harris  
Grandchildren's Trust for the Children of King  
Harris – John B. Harris under Trust Agreement  
dated 01/13/59, Bette D. Harris Grandchildren's  
Trust for the Children of Toni Paul under Trust  
Agreement dated 01/13/59, Toni Harris Paul  
Children's Trust dated 12/15/76, and in his  
capacity as custodian for Charles Henry Paul  
Under the Illinois Uniform Gifts to Minors Act  
under Agreement dated 06/01/79, custodian for  
Kelly Lynn Paul Under the Illinois Uniform Gifts  
to Minors Act under Agreement dated 10/01/80,  
custodian for Alan Harris Paul Under the Illinois  
Uniform Gifts to Minors Act under Agreement  
dated 12/20/84, and custodian for Laurie Beth Paul  
Under the Illinois Uniform Gifts to Minors Act  
under Agreement dated 12/20/84;

KATHERINE P. HARRIS, in her capacity as  
trustee of the HHI Investment Trust #2, Bette D.  
Harris Grandchildren's Trust for the Children of  
Katherine Harris – Pam Friend Szokol under Trust  
Agreement dated 01/13/59, Bette D. Harris  
Grandchildren's Trust for the Children of  
Katherine Harris – William Friend under Trust  
Agreement dated 01/13/59, Bette D. Harris  
Grandchildren's Trust for the Children of King  
Harris – John B. Harris under Trust Agreement  
dated 01/13/59, Bette D. Harris Grandchildren's  
Trust for the Children of Toni Paul under Trust  
Agreement dated 01/13/59, King W. W. Harris  
Trust for Children under Trust Agreement dated  
12/15/76, Toni Harris Paul Children's Trust dated  
12/15/76, and in her capacity as custodian for John  
B. Harris Under the Illinois Uniform Gifts to  
Minors Act under Agreement dated 12/01/76;

TONI H. PAUL, in her capacity as trustee of the  
HHI Investment Trust #2;

DENISE SAUL, in her capacity as trustee of the  
King W. W. Harris Trust for Children under Trust  
Agreement dated 12/15/76;

SIDNEY BARROWS, in his capacity as trustee of

the King W. W. Harris Trust for Children under  
Trust Agreement dated 12/15/76;

THE HARRIS FAMILY FOUNDATION;

PAM F. SZOKOL TRUST;

WILLIAM J. FRIEND TRUST DATED 06/22/95;

SCOTT C. FRIEND TRUST OF 1984 UNDER  
TRUST AGREEMENT DATED 11/21/84;

BETTE D. HARRIS GRANDCHILDREN'S  
TRUST FOR THE CHILDREN OF KATHERINE  
HARRIS – PAM FRIEND SZOKOL UNDER  
TRUST AGREEMENT DATED 01/13/59;

BETTE D. HARRIS GRANDCHILDREN'S  
TRUST FOR THE CHILDREN OF KATHERINE  
HARRIS – WILLIAM FRIEND UNDER TRUST  
AGREEMENT DATED 01/13/59;

BETTE D. HARRIS GRANDCHILDREN'S  
TRUST FOR THE CHILDREN OF KING  
HARRIS – JOHN B. HARRIS UNDER TRUST  
AGREEMENT DATED 01/13/59;

BETTE D. HARRIS GRANDCHILDREN'S  
TRUST FOR THE CHILDREN OF TONI PAUL  
UNDER TRUST AGREEMENT DATED  
01/13/59;

KING W. W. HARRIS TRUST FOR CHILDREN  
UNDER TRUST AGREEMENT DATED  
12/15/76;

TONI HARRIS PAUL CHILDREN'S TRUST  
DATED 12/15/76;

KATHERINE HARRIS CUSTODIAN FOR  
JOHN B. HARRIS UNDER THE ILLINOIS  
UNIFORM GIFTS TO MINORS ACT UNDER  
AGREEMENT DATED 12/01/76;

KING HARRIS CUSTODIAN FOR CHARLES  
HENRY PAUL UNDER THE ILLINOIS  
UNIFORM GIFTS TO MINORS ACT UNDER  
AGREEMENT DATED 06/01/79;

KING HARRIS CUSTODIAN FOR KELLY LYNN PAUL UNDER THE ILLINOIS UNIFORM GIFTS TO MINORS ACT UNDER AGREEMENT DATED 10/01/80;

KING HARRIS CUSTODIAN FOR ALAN HARRIS PAUL UNDER THE ILLINOIS UNIFORM GIFTS TO MINORS ACT UNDER AGREEMENT DATED 12/20/84;

KING HARRIS CUSTODIAN FOR LAURIE BETH PAUL UNDER THE ILLINOIS UNIFORM GIFTS TO MINORS ACT UNDER AGREEMENT DATED 12/20/84;

JOHN B. HARRIS;

CHARLES HENRY PAUL;

KELLY LYNN PAUL;

ALAN HARRIS PAUL; and

LAURIE BETH PAUL,

Defendants.

**SECOND AMENDED CASE MANAGEMENT NOTICE**

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “Order”) [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

1. Fact Discovery shall be completed by: March 2, 2015
2. The Disclosure of Case-in-Chief Experts shall be due: May 29, 2015
3. The Disclosure of Rebuttal Experts shall be due: June 29, 2015
4. The Deadline for Completion of Expert Discovery shall be: September 11, 2015

5. The Deadline for Service of a Notice of Mediation Referral shall be: September 30, 2015
6. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: October 16, 2015
7. The Deadline for Conclusion of Mediation shall be: February 19, 2016

Dated: New York, New York  
January 14, 2015

BAKER & HOSTETLER LLP

By: /s/ Nicholas J. Cremona

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